

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**LEON WEINGRAD,**

**Plaintiff,**

**v.**

**POSIGEN DEVELOPER, LLC,**

**Defendant.**

**CIVIL ACTION NO. 2:24-CV-06503-  
GAW**

**DEFENDANT POSIGEN DEVELOPER, LLC'S  
CONSENT MOTION TO EXTEND TIME TO RESPOND PLAINTIFF'S  
INTERROGATORIES, DOCUMENT REQUESTS, AND REQUESTS FOR ADMISSION**

AND NOW comes Defendant POSIGEN DEVELOPER, LLC ("Defendant") by and through its counsel, Gordon Rees Scully Mansukhani, LLP respectfully requests an extension of time to respond to Plaintiff's discovery including Interrogatories, Document Requests, and Requests for Admission ("Discovery Requests"), respectfully averring as follows:

1. Defendant was served with the Discovery Requests on April 14, 2025.
2. Defendant's responses to the Discovery Requests are due on May 14, 2025.
3. Counsel for the Defendant requires additional time to confer with the client and to analyze and formulate its objections and responses.
4. No prejudice will result from the extension of time sought herein, and no rights of Plaintiff will be diminished as a result of this brief extension.
5. Defendant's counsel conferred with Plaintiff's counsel, and Plaintiff's counsel consents to the requested extension.

WHEREFORE, Defendant respectfully requests that this Court enter the attached proposed Order granting Defendant's motion for a thirty-day extension of time and providing Defendant until June 13, 2025 to respond to Plaintiff's discovery including Interrogatories, Document

Requests, and Requests for Admission.

**Gordon Rees Scully Mansukhani, LLP**

Dated: May 14, 2025

By: /s/ Jessica G. Lucas  
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**ORDER**

**AND NOW**, this \_\_\_\_ day of \_\_\_\_\_, 2025, upon consideration of Defendant's Consent Motion to Extend Time to Respond to Plaintiff's discovery including Interrogatories, Document Requests, and Requests for Admission, it is hereby **ORDERED, ADJUDGED**, and **DECREED** that the Motion is **GRANTED**. Defendant's responses to the Discovery Requests are now due on June 13, 2025.

**BY THE COURT:**

\_\_\_\_\_*J.*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Motion to Extend Time to Respond to Plaintiff's Discovery Requests has been served as set forth below on this 14th day of May, 2025 upon all counsel and parties of record via the Court's Electronic Filing System.

By: /s/ Jessica G. Lucas  
Jessica G. Lucas